

IN THE UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK (MANHATTAN)

_____	)	In Proceedings for a Reorganization
	)	Under Chapter 11
IN RE:	)	
	)	Case No. 08-11153-mg
LEXINGTON PRECISION CORPORATION	)	
	)	JUDGE: MARTIN GLENN
Debtor	)	
_____	)	

**VERIFIED STATEMENT ON BEHALF OF KELLEY & FERRARO, LLP,**  
**PURSUANT TO RULE 2019 OF THE FEDERAL RULES OF BANKRUPTCY**  
**PROCEDURE CONCERNING MULTIPLE REPRESENTATION OF**  
**ASBESTOS-RELATED CREDITORS**

Thomas M. Wilson, on behalf of Kelley & Ferraro, LLP (“Kelley & Ferraro”), pursuant to Rule 2019 of the Federal Rules of Bankruptcy Procedure, files this statement in connection with Kelley & Ferraro’s representation of numerous unsecured creditors who have unliquidated asbestos-related tort claims against Lexington Precision Corporation (“Debtor”):

1. Names and Address of Creditors Represented By Kelley & Ferraro

Kelley & Ferraro serves as legal counsel to numerous unsecured creditors of Lexington Precision Corporation as set forth in Exhibit A, which is attached hereto and fully incorporated herein. This Exhibit sets forth information in columns labeled as follows: name, address, liquidated/unliquidated, date claim acquired and disease category.

2. The Nature and Amount of Claims of the Parties in Interest and Times of Acquisition Thereof

Each of the unliquidated creditors' claims are tort claims which arose due to the individual's exposure to Lexington Precision Corporation's asbestos-containing products. While this exposure occurred at various times for each individual, the specific dates for the accrual of each creditor's cause of action is set forth under date acquired on Exhibit A, which is the underlying date of diagnosis. These claims arose in the ordinary course of business of Debtor Lexington Precision Corporation. As it is an unliquidated claim, the approximate amount of each individual claim is unknown at this time.

3. Pertinent Facts and Circumstances in Connection with the Employment of Kelley & Ferraro

The unliquidated creditors retained Kelley & Ferraro either directly or through other legal counsel to provide legal representation in regard to the commencement and prosecution of their individual asbestosis related claims against various manufacturers, and distributors of asbestos-containing products, including Debtor Lexington Precision Corporation.

4. Claims or Interests Owned by Kelley & Ferraro

Kelley & Ferraro presently does not own nor have they ever previously owned any claim or interest against the Debtor Lexington Precision Corporation.

5. Bankruptcy Proxies

Kelley & Ferraro believes that it has authority to vote for each claimant set forth on Exhibit A. Kelley & Ferraro believes that separate Bankruptcy Proxies and/or Retainer Agreements containing Bankruptcy Proxies, or both, exist for all individuals set forth on Exhibit A.

Respectfully submitted this 2<sup>nd</sup> day of July 2008.

KELLEY & FERRARO, LLP

/s/ Thomas M. Wilson  
Thomas M. Wilson, Esq.  
2200 Key Tower  
127 Public Square  
Cleveland, Ohio 44114  
(216) 575-0777  
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**VERIFICATION**

I, Thomas M. Wilson, an attorney in the law firm of Kelley & Ferraro, LLP, declare under penalty of perjury that I have read the foregoing statement and that it is true and correct to the best of my knowledge, information and belief.

/s/ Thomas M. Wilson  
Thomas M. Wilson  
KELLEY & FERRARO, LLP  
2200 Key Tower  
127 Public Square  
Cleveland, Ohio 44114  
(216) 575-0777

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing Verified Statement Pursuant to Rule 2019 of the Federal Rules of Bankruptcy Procedure Concerning Multiple Representation of Creditors, with attachments, was electronically filed via CM/ECF and thereby served upon all counsel of record on July 2, 2008.

/s/ Thomas M. Wilson  
Thomas M. Wilson (0038933)